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October 11, 2022

Hon. Ronnie Abrams
United States District Court
U.S. Courthouse
40 Foley Square
New York, New York 10007

Application granted.

SO ORDERED.

Re: United States v. Ortega, et al
S3 22 Cr. 91 (RA)



Ronnie Abrams, U.S.D.J.
October 12, 2022

Dear Judge Abrams:

I write today to respectfully request a modification of defendant **Josefina Marine's** bail conditions. At last Thursdays' bail hearing in Magistrate Court Ms. Marine was released on her own signature to a \$100,000.00 appearance bond to be co-signed by three financially responsible individuals within three weeks of that appearance. Ms. Marine's travel is restricted to the Southern and Eastern Districts of New York and she was placed on home detention at her daughter's home in Harrison, New Jersey with leave to attend to her employment at Macy's in Manhattan.

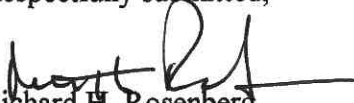
At the bail hearing the Government insisted on a condition that Ms. Marine not return home to her own residence in Manhattan. Her daughter, Melanie Quezada, an Executive Assistant at JP Morgan, was in the courtroom and is one of the proposed suretors. Ms. Quezada volunteered to take her mother to her home in Harrison, New Jersey. Ms. Marine works full time from 2pm to 8:30 pm at Macy's in Manhattan. Because travel to and from work to New Jersey, especially late at night, is problematic and difficult for Ms. Marine (she is also post- breast cancer surgery this past few months ago) she and the family would like her to move in with her sister, Sonia Marine.

Sonia, is 64 years of age and resides at 10 Stanton Street, Apt. 64 NY NY 10002. The home phone there is 646-838-5766. Sonia is disabled and is assisted by a visiting home health aide during the week. Also, Sonia's young brother resides at the apartment as well. (Age 19). Josefina would have her own room and has in the past helped out with assisting her sister so the move would be beneficial to Sonia as well.

I have communicated these circumstances with Ashley Cosme from Pre-Trial Services and with Micah Fergenson, Assistant United States Attorney. Both have indicated that they have no objection to the modification permitting Ms. Marine to reside with her sister Sonia Marine in Manhattan. No other modification is sought at this time.

Thank you for your consideration to this request and continued courtesies to counsel.

Respectfully submitted,



Richard H. Rosenberg

cc.: All parties (by ECF)